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) INDICTMENT

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1. Defendant CARLEN OSBORNE CLEMONS, also known as, CARLEN LORRAINE LEWIS (“CLEMONS”), was a United States citizen and a resident of Virginia.
2. From in and around June 2009, until in and around June 2015, CLEMONS operated and did business as Foreclosure Prevention Center (“FPC”), targeting vulnerable homeowners who were in danger of losing their homes to foreclosure, and representing that FPC could aid or assist them in preventing the foreclosure of their homes.
3. CLEMONS distributed, and caused to be distributed, by the United States mail and otherwise, advertisements soliciting vulnerable and distressed homeowners who were interested in delaying and preventing the foreclosure of their homes. The advertisements included statements of the homeowners’ “Notice of HUD Rights,” and falsely represented that FPC offered assistance with repayment programs to restructuring loans, past-due balances, and

stopping foreclosures. The advertisements directed homeowners to contact FPC via a toll-free number.

4. The United States Department of Housing and Urban Development (“HUD”) is an Executive Branch agency of the United States government responsible for, among other things, the administration of certain programs to assist homeowners who are at risk of foreclosure.

5. CLEMONS falsely represented that FPC was affiliated with HUD.

6. CLEMONS instructed homeowners who contacted FPC to provide various documents, including bank statements, utility bills, mortgage statements, pay-stubs, and tax-returns.

7. CLEMONS falsely represented that FPC would accept “mortgage payments” from the homeowners in order to transmit those payments to the homeowners’ mortgage lenders.

8. CLEMONS also told homeowners to cease all communication with their mortgage lenders and to ignore statements reflecting non-payment of their mortgage loans.

9. After receiving the “mortgage payments” from the homeowners, CLEMONS failed to remit payments to the mortgage lender and failed to return the money to homeowners.

10. As a result of CLEMONS’ scheme, some homeowners lost their homes to foreclosure.

COUNTS 1-12

(Mail Fraud, Title 18, United States Code, Section 1341)

The Grand Jury charges:

11. Paragraphs 1-10 of the Indictment are re-alleged and incorporated by reference as if fully set forth herein.

12. From on or about April 12, 2014, until in or around November 2014, in the Northern District of Ohio and elsewhere, the Defendant CARLEN OSBORNE CLEMONS, knowingly devised and intended to devise a scheme and artifice to defraud, and to obtain money and property by means of false and fraudulent pretenses, representations and promises, as more fully described above, and for the purpose of executing and attempting to execute said scheme and artifice to defraud, knowingly transmitted and caused matters to be placed in any post office and authorized deposits for mail matter, to be sent and delivered by the United States Postal Service and private and commercial interstate carriers, in accordance with the directions thereon, each mailing constituting a separate count:

Count	Approx. Date	Item Mailed From	Named Recipient	Content of Mailed Matter
1	April 29, 2014	J.R., Canton, Ohio	FPC	Western Union Money Order #47-020207340 for \$500
2	April 30, 2014	K.S., Toledo, Ohio	FPC	Check #4193 for \$3,000
3	May 17, 2014	K.S., Toledo, Ohio	FPC.	Check #4194 for \$2,000
4	July 12, 2014	K.S., Toledo, Ohio	FPC	Check #4196 for \$705
5	August 5, 2014	K.S., Toledo, Ohio	FPC	Check #4197 for \$705
6	August 12, 2014	K.S., Toledo, Ohio	FPC	Check #4198 for \$1,055
7	September 29, 2014	K.S., Toledo, Ohio	FPC	Check #4201 for \$705
8	November 3, 2014	K.S., Toledo, Ohio	FPC	Check #4203 for \$705
9	November 5, 2014	K.S., Toledo, Ohio	FPC	Check #4204 for \$705
10	November 6, 2014	K.S., Toledo, Ohio	FPC	Check #4202 for \$350
11	April 30, 2014	D.M and L.M., Toledo, Ohio	FPC	Check #4666 for \$911

12	May 29, 2014	D.M and L.M., Toledo, Ohio	FPC	Check #4683 for \$911
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All in violation of Section 1341 of Title 18 United States Code.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government
Act of 2002.